PUBLIC AWARENESS PROGRAM EFFECTIVE INSPECTION SPECIFIC INFORMATION

Control Information

INSPECTION START DATE:	6/19/2014
INSPECTION END DATE:	6/19/2014
OPERATOR ID:	15700
OPERATOR NAME:	PLEASANT HILL GAS SYSTEM, VILLAGE OF
STATE/OTHER ID:	
ACTIVITY RECORD ID NUMBER	
COMPANY OFFICIAL:	Jason Clendenny
COMPANY OFFICIAL STREET:	104 West Quincy Street PO Box 187
COMPANY OFFICIAL CITY:	Pleasant Hill, Illinois
COMPANY OFFICIAL STATE:	IL
COMPANY OFFICIAL ZIP:	62366
COMPANY_OFFICIAL_TITLE:	Employee
PHONE NUMBER:	(217) 734-2111
FAX NUMBER:	(217) 734-2041
EMAIL ADDRESS:	phvillage187@gmail.com
WEB SITE:	
TOTAL MILEAGE:	11
TOTAL MILEAGE IN HCA:	
NUMBER OF SERVICES (DISTR):	571
ALTERNATE MAOP (80% RULE):	
NUMBER OF SPECIAL PERMITS:	
INITIAL DATE OF PAP:	6/19/2014
TITLE OF CURRENT PAP:	Village of Pleasant Hill PA Plan
CURRENT PAP VERSION:	3
CURRENT PAP DATE:	10/24/2013
DATE SUBMITTED FOR APPROVAL:	
DIRECTOR APPROVAL:	
APPROVAL DATE:	

OPERATORS COVERED UNDER PROGRAM:	OPERATOR ID	NAME
	15700	PLEASANT HILL GAS SYSTEM, VILLAGE OF

UNITS COVERED UNDER PROGRAM:	UNIT ID	NAME
	15700	Village of Pleasant Hill

PERSON INTERVIEWED	TITLE/ORGANIZATION	PHONE NUMBER	EMAIL ADDRESS	
Jason Clendenny	Employee	(217) 734-2111	phvillage187@gmail.com	

INSPECTOR REPRESENTATIVE(S)	PHMSA/STATE	REGION/STATE	EMAIL ADDRESS	LEAD
Donald R. Hankins	State	IL	dhankins@icc.illinois.gov	☑

Mileage Covered by Public Awareness Program (by Company and State)

Based on the most recently submitted annual report, list each company and subsidiary separately, broken down by state (using 2-letter designation). Also list any new lines in operation that are not included on the most recent annual report. If a company has intrastate and/or interstate mileage in several states, use one row per state. If there both gas and liquid lines, use the appropriate table for intrastate and/or interstate.

Jurisdictional to Part 192 (Gas) Mileage (Intrastate)

COMPANY NAME	OPERATOR ID	PRODUCT TYPE	STATE	GATHERING INTRASTATE	TRANSMISSION INTRASTATE	DISTRIBUTION* INTRASTATE	REMARKS (new?)
PLEASANT HILL GAS SYSTEM, VILLAGE OF	15700	Natural Gas	IL	0	0	11	

1. Supply company name and Operator ID, if not the master operator from the first page (i.e., for subsidiary companies).
2. Use OPS-assigned Operator ID. Where not applicable, leave blank or enter N/A
3. Use only 2-letter state codes in column #3, e.g., TX for Texas.
4. Enter number of applicable miles in all other columns. (Only positive values. No need to enter 0 or n/a.)
5. *Please do not include Service Line footage. This should only be MAINS.

Please provide a comment or explanation for inspection results for each question.

1. Administration and Development of Public Awareness Program

1.01 Written Public Education Program

Does the operator have a written continuing public education program or public awareness program (PAP) in accordance with the general program recommendations in the American Petroleum Institute's (API) Recommended Practice (RP) 1162 (incorporated by reference), by the required date, except for master meter or petroleum gas system operators?

• Verify the operator has a written public awareness program (PAP).

• Review any Clearinghouse deficiencies and verify the operator addressed previous Clearinghouse deficiencies, if any, addressed in the operator's PAP.

• Identify the location where the operator's PAP is administered and which company personnel is designated to administer and manage the written program.

• Verify the date the public awareness program was initially developed and published.

CODE REFERENCE: § 192.616 (h); § 195.440 (h)

○ S - Satisfactory (explain)
○ U - Unsatisfactory (explain)
○ N/A - Not Applicable (explain)
○ N/C - Not Checked (explain)

COMMENTS:
The operator has a public awareness program.

No clearinghouse deficiencies

The program administrator will be the gas or utility superintendent.

The initial plan was created on 6/2/2006 .

1.02 Management Support

Does the operator's program include a statement of management support (i.e., is there evidence of a commitment of participation, resources, and allocation of funding)?
• Verify the PAP includes a written statement of management support.
• Determine how management participates in the PAP.
• Verify that an individual is named and identified to administer the program with roles and responsibilities.
• Verify resources provided to implement public awareness are in the PAP. Determine how many employees involved with the PAP and what their roles are.
• Determine if the operator uses external support resources for any implementation or evaluation efforts.
CODE REFERENCE: § 192.616 (a); § 195.440 (a), API RP 1162 Section 2.5 and 7.1

○ S - Satisfactory (explain)
○ U - Unsatisfactory (explain)
○ N/A - Not Applicable (explain)
○ N/C - Not Checked (explain)

COMMENTS:
The mayor has signed a written statement of support for the Public Awareness Plan.

A general statement says that the program shall be fully funded and has the full support of the Mayor/program administrator.

The gas or utility superintendent is the program administrator.

The gas or utility superintendent is the only employee involved with the PAP.

Beginning in 2013, Paradigm was hired as an external entity.

1.03 Unique Attributes and Characteristics

Does the operator's program clearly define the specific pipeline assets or systems covered in the program and assess the unique attributes and characteristics of the pipeline and facilities?
• Verify the PAP includes all of the operator's system types/assets covered by PAP (gas, liquid, HVL, storage fields, gathering lines etc).
• Identify where in the PAP the unique attributes and characteristics of the pipeline and facilities are included (i.e. gas, liquids, compressor stations, valves, breakout tanks, odorizers).

CODE REFERENCE: § 192.616 (b); § 195.440 (b), API RP 1162 Section 2.7 and Section 4

	COMMENTS:
⦿ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not Applicable (explain) ○ N/C - Not Checked (explain)	The operator's PAP includes that the system is of Natural gas. The operator's PAP includes that the system has gas, valves and odorizers. Section 2 of the O&M plan emergency valves are listed. Section 7 of the O&M plan talks about the odorizer.

1.04 Stakeholder Audience Identification

Does the operator's program establish methods to identify the individual stakeholders in the four affected stakeholder audience groups: (1) affected public, (2) emergency officials, (3) local public officials, and (4) excavators, as well as affected municipalities, school districts, businesses, and residents?
• Identify how the operator determines stakeholder notification areas and distance on either side of the pipeline.
• Determine the process and/or data source used to identify each stakeholder audience.
• Select a location along the operator's system and verify the operator has a documented list of stakeholders consistent with the requirements and references noted above.
[ ] Affected public
[ ] Emergency officials
[ ] Public officials
[ ] Excavators

CODE REFERENCE: § 192.616 (d), (e), (f); § 195.440 (d), (e), (f), API RP 1162 Section 2.2 and Section 3

	COMMENTS:
⦿ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not Applicable (explain) ○ N/C - Not Checked (explain)	The operators program established methods to identify the four affected stakeholder Two buffer distances for high, and low population areas, high population is 500 ft total, 250 ft either side or low population is 1000 ft. total, either side Paradigm used centerline data from the Village of Pleasant Hill for the plan. A master list was provided by the Village of all stakeholder in the Village and in the rural area.

1.05 Message Frequency and Message Delivery

Does the operator's program define the combination of messages, delivery methods, and delivery frequencies to comprehensively reach all affected stakeholder audiences in all areas in which the operator transports gas, hazardous liquid, or carbon dioxide?

• Identify where in the operator's PAP the combination of messages, delivery methods, and delivery frequencies are included for the following stakeholders: (1) affected public (2) emergency officials (3) local public officials, and (4) excavators.

[ ] Affected public
[ ] Emergency officials
[ ] Public officials
[ ] Excavators

CODE REFERENCE: § 192.616 (f); § 195.440 (f), API RP 1162 Sections 3-5

◉ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not Applicable (explain) ○ N/C - Not Checked (explain)	COMMENTS: Staff identified that the plan states messages will be provided through direct mailing or direct communications. The plan states the frequencies for each of the stakeholders. Affected public is twice annually Emergency officials once annually Public officials once annually Excavators once annually.

1.06 Written Evaluation Plan

Does the operator's program include a written evaluation process that specifies how the operator will periodically evaluate program implementation and effectiveness? If not, did the operator provide justification in its program or procedural manual?

• Verify the operator has a written evaluation plan that specifies how the operator will conduct and evaluate self-assessments (annual audits) and effectiveness evaluations.

• Verify the operator's evaluation process specifies the correct frequency for annual audits (1 year) and effectiveness evaluations (no more than 4 years apart).

• Identify how the operator determined a statistical sample size and margin-of-error for stakeholder audiences surveys and feedback.

CODE REFERENCE: § 192.616 (c),(i); § 195.440 (c),(i)

◉ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not Applicable (explain) ○ N/C - Not Checked (explain)	COMMENTS: Section 4 C, Program Administration and implementation. The Plan states that an evaluation will be done every 4 years. The responses that are received will be calculated by a formula to determine the percentage actually surveyed.

2. Program Implementation

2.01 English and other Languages

Did the operator develop and deliver materials and messages in English and in other languages commonly understood by a significant number and concentration of non-English speaking populations in the operator's areas?

• Determine if the operator delivers material in languages other than English and if so, what languages.
• Identify the process the operator used to determine the need for additional languages for each stakeholder audience.
• Identify the source of information the operator used to determine the need for additional languages and the date the information was collected.
CODE REFERENCE: § 192.616 (g); § 195.440 (g), API RP 1162 Section 2.3.1

	COMMENTS:
⦿ S - Satisfactory (explain) ◯ U - Unsatisfactory (explain) ◯ N/A - Not applicable (explain) ◯ N/C - Not Checked (explain)	Material that was mailed out was in English and Spanish. The plan states that the United States Census Bureau can be used every 5 years to determine if other languages need to be added to the plan.

2.02 Message Type and Content

Did the messages the operator delivered specifically include provisions to educate the public, emergency officials, local public officials, and excavators on the:
• Use of a one-call notification system prior to excavation and other damage prevention activities;
• Possible hazards associated with unintended releases from a gas, hazardous liquid, or carbon dioxide pipeline facility;
• Physical indications of a possible release;
• Steps to be taken for public safety in the event of a gas, hazardous liquid, or carbon dioxide pipeline release; and
• Procedures to report such an event (to the operator)?

• Verify all required information was delivered to each of the primary stakeholder audiences.
• Verify the phone number listed on message content is functional and clearly identifies the operator to the caller.

[ ] Affected public
[ ] Emergency officials
[ ] Public officials
[ ] Excavators
CODE REFERENCE: § 192.616 (d), (f); § 195.440 (d), (f)

	COMMENTS:
⦿ S - Satisfactory (explain) ◯ U - Unsatisfactory (explain) ◯ N/A - Not applicable (explain) ◯ N/C - Not Checked (explain)	The Village of Pleasant Hill is a member of the state one call system Julie. Section 4 Page 6 Leak recognition and response. The phone number is up to date. The information was delivered to each primary stakeholder. The numbers listed on the message content is the proper numbers for the Village of Pleasant Hill.

2.03 Messages on Pipeline Facility Locations

Did the operator develop and deliver messages to advise affected municipalities, school districts, businesses, and residents of pipeline facility location?
• Verify that the operator developed and delivered messages advising municipalities, school districts, businesses, residents of pipeline facility locations.

CODE REFERENCE: § 192.616 (e)(f); § 195.440 (e)(f)

◉ S - Satisfactory (explain)
○ U - Unsatisfactory (explain)
○ N/A - Not applicable (explain)
○ N/C - Not Checked (explain)

COMMENTS:

Affected public are twice annually.
Emergency officials are once annually.

Public officials are once annually.

Excavators are once annually.

Mailing dates was on August 15, 2013 and again on December 12, 2013.

2.04 Baseline Message Delivery Frequency

Did the operator's delivery for materials and messages meet or exceed the baseline frequencies specified in API RP 1162, Table 2-1 through Table 2.3? If not, did the operator provide justification in its program or procedural manual?
• Identify message delivery (using the operator's last five years of records) for the following stakeholder audiences:
[ ] Affected public
[ ] Emergency officials
[ ] Public officials
[ ] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c)

◉ S - Satisfactory (explain)
○ U - Unsatisfactory (explain)
○ N/A - Not applicable (explain)
○ N/C - Not Checked (explain)

COMMENTS:
The operator's materials meet the frequencies.

2.05 Considerations for Supplemental Program Enhancements

Did the operator consider, along all of its pipeline systems, relevant factors to determine the need for supplemental program enhancements as described in API RP 1162 for each stakeholder audience?

[ ] Affected public
[ ] Emergency officials
[ ] Public officials
[ ] Excavators

Determine if the operator has considered and/or included other relevant factors for supplemental enhancements.
CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 6.2

⦿ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not applicable (explain) ○ N/C - Not Checked (explain)	COMMENTS: The operator does consider if there are any relevant factors for the need for a supplemental program

2.06 Maintaining Liaison with Emergency Response Officials

Did the operator establish and maintain liaison with appropriate fire, police, and other public officials to: learn the responsibility and resources of each government organization that may respond, acquaint the officials with the operator's ability in responding to a pipeline emergency, identify the types of pipeline emergencies of which the operator notifies the officials, and plan how the operator and other officials can engage in mutual assistance to minimize hazards to life or property?

• Examine the documentation to determine how the operator maintains a relationship with appropriate emergency officials.
• Verify the operator has made its emergency response plan available, as appropriate and necessary, to emergency response officials.
• Identify the operator's expectations for emergency responders and identify whether the expectations are the same for all locations or does it vary depending on locations.
• Identify how the operator determined the affected emergency response organizations have adequate and proper resources to respond.
• Identify how the operator ensures that information was communicated to emergency responders that did not attend training/information sessions by the operator.
CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 4.4

⦿ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not applicable (explain) ○ N/C - Not Checked (explain)	COMMENTS: Liaison meeting were held on 2/17/13.

3. Program Evaluation & Continuous Improvement (Annual Implementation Audits)

3.01 Measuring Program Implementation

Has the operator performed an audit or review of its program implementation annually since it was developed? If not, did the operator provide justification in its program or procedural manual?

• Verify the operator performed an annual audit or review of the PAP for each implementation year.
CODE REFERENCE: § 192.616 (c), (i); § 195.440 (c), (i), API RP 1162 Section 8.3

◉ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not applicable (explain) ○ N/C - Not Checked (explain)	COMMENTS: The plan was reviewed on February 10, 2013.

3.02 Acceptable Methods for Program Implementation Audits

Did the operator use one or more of the three acceptable methods (i.e., internal assessment, 3rd-party contractor review, or regulatory inspections) to complete the annual audit or review of its program implementation? If not, did the operator provide valid justification for not using one of these methods?
• Determine how the operator conducts annual audits/reviews of its PAP.
CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

◉ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not applicable (explain) ○ N/C - Not Checked (explain)	COMMENTS: The operator has made two change to the first plan, with the operator using the three acceptable methods to complete the annual audit.

3.03 Program Changes and Improvements

Did the operator make changes to improve the program and/or the implementation process based on the results and findings of the annual audit? If not, did the operator provide justification in its program or procedural manual?
• Determine if the operator assessed the results of its annual PAP audit/review then developed and implemented changes in its program, as a result.
• If not, determine if the operator documented the results of its assessment and provided justification as to why no changes were needed.
CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.3

◉ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not applicable (explain) ○ N/C - Not Checked (explain)	COMMENTS: The Village of Pleasant Hill conducted an evaluation of its program with any revisions being made by USDI. Information was sent to all stakeholders.

4. Program Evaluation & Continuous Improvement (Effectiveness Evaluations)

4.01 Evaluating Program Effectiveness

Did the operator perform an effectiveness evaluation of its program (or no more than 4 years following the effective date of program implementation) to assess its program effectiveness in all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?
• Verify the operator conducted an effectiveness evaluation of its program program (or no more than 4 years

following the effective date of program implementation).

•Document when the effectiveness evaluation was completed.

•Determine what method was used to perform the effectiveness evaluation (in-house, by 3rd party contractor, participation in and use the results of an industry group or trade association).

•Identify how the operator determined the sample sizes for audiences in performing its effectiveness evaluation.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP1162 Section 8.4

	COMMENTS:
◉ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not Applicable (explain) ○ N/C - Not Checked (explain)	The Village of Pleasant Hill did conduct an effectiveness evaluation of its program. The evaluation was done by Paradigm Alliance, INC. in 2013. Information was sent to all stakeholders.

4.02 Measure Program Outreach

In evaluating effectiveness, did the operator track actual program outreach for each stakeholder audience within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

•Examine the process the operator used to track the number of individuals or entities reached within each intended stakeholder audience group.

•Determine the outreach method the operator used to perform the effectiveness evaluation (e.g., questionnaires, telephone surveys, etc).

•Determine how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.

[ ] Affected public

[ ] Emergency officials

[ ] Public officials

[ ] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.1

	COMMENTS:
◉ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not Applicable (explain) ○ N/C - Not Checked (explain)	All stakeholder audience received information from Paradigm Alliance, INC.

4.03 Measure Percentage Stakeholders Reached

Did the operator determine the percentage of the individual or entities actually reached within the target audience within all areas along all systems covered by its program? If not, did the operator provide justification in its program or procedural manual?

•Document how the operator determined the statistical sample size and margin-of-error for each of the four intended stakeholder audiences.

•Document how the operator estimated the percentage of individuals or entities actually reached within each intended stakeholder audience group.

[ ] Affected public

[ ] Emergency officials

[ ] Public officials

[ ] Excavators

CODE REFERENCE: § 192.616) (c); § 195.440 (c), API RP 1162 Section 8.4.1

	COMMENTS:
◉ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not Applicable (explain) ○ N/C - Not Checked (explain)	A summary report was used within all areas of the system covered by this program.

4.04 Measure Understandability of Message Content

In evaluating effectiveness, did the operator assess the percentage of the intended stakeholder audiences that understood and retained the key information in the messages received, within all areas along all assets and systems covered by its program? If not, did the operator provide justification in its program or procedural manual? (Reference: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2)

•Examine the operator's evaluation results and data to assess the percentage of the intended stakeholder audience that understood and retained the key information in each PAP message.

•Verify the operator assessed the percentage of the intended stakeholder audience that (1) understood and (2) retained the key information in each PAP message.

•Determine if the operator pre-tests materials.

[ ] Affected public

[ ] Emergency officials

[ ] Public officials

[ ] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.2

	COMMENTS:
◉ S - Satisfactory (explain) ◉ U - Unsatisfactory (explain) ◉ N/A - Not Applicable (explain) ◉ N/C - Not Checked (explain)	The operator will use a baseline of responses for each stakeholder group.

4.05 Measure Desired Stakeholder Behavior

In evaluating its public awareness program effectiveness, did the operator attempt to determine whether appropriate preventive behaviors have been understood and are taking place when needed, and whether appropriate response and mitigative behaviors would occur and/or have occurred? If not, did the operator provide justification in its program or procedural manual?

• Examine the operator's evaluation results and data to determine if the stakeholders have demonstrated the intended learned behaviors.

• Verify the operator determined whether appropriate prevention behaviors have been understood by the stakeholder audiences and if those behaviors are taking place or will take place when needed.

[ ] Affected public

[ ] Emergency officials

[ ] Public officials

[ ] Excavators

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.3

◉ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not Applicable (explain) ○ N/C - Not Checked (explain)	COMMENTS: The operator will strive for continual improvement of the number of surveys returned each period of the effectiveness survey. The Village of Pleasant Hill pre-test materials

4.06 Measure Bottom-Line Results

In evaluating its public awareness program effectiveness, did the operator attempt to measure bottom-line results of its program by tracking third-party incidents and consequences including: (1) near misses, (2) excavation damages resulting in pipeline failures, (3) excavation damages that do not result in pipeline failures? Did the operator consider other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines? If not, did the operator provide justification in its program or procedural manual?

• Examine the operator's process for measuring bottom-line results of its program.

• Verify the operator measured bottom-line results by tracking third-party incidents and consequences.

• Determine if the operator considered and attempted to measure other bottom-line measures, such as the affected public's perception of the safety of the operator's pipelines. If not, determine if the operator has provided justification in its program or procedural manual for not doing so.

CODE REFERENCE: § 192.616 (c); § 195.440 (c), API RP 1162 Section 8.4.4

◉ S - Satisfactory (explain) ○ U - Unsatisfactory (explain) ○ N/A - Not Applicable (explain) ○ N/C - Not Checked (explain)	COMMENTS: No third party damages.

4.07 Program Changes

Did the operator identify and document needed changes and/or modifications to its public awareness program(s) based on the results and findings of its program effectiveness evaluation? If not, did the operator provide justification in its program or procedural manual?

•Examine the operator's program effectiveness evaluation findings.

•Identify if the operator has a plan or procedure that outlines what changes were made.

•Verify the operator identified and/or implemented improvements based on assessments and findings.

CODE REFERENCE: § 192.616 (c), § 195.440 (c), API RP 1162 Section 2.7 Step 12 and 8.5

⦿ S - Satisfactory (explain)

◯ U - Unsatisfactory (explain)

◯ N/A - Not Applicable (explain)

◯ N/C - Not Checked (explain)

COMMENTS:

The operator's findings were documented using their evaluation findings.

The operator has an outline with no changes were made to the plan.

No changes were identified or implemented based on the findings.

5. Inspection

SUMMARY:

FINDINGS: